

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JUSTIN PULLIAM,

*Plaintiff,*

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;  
SHERIFF ERIC FAGAN, in his  
individual capacity; OFFICER ROBERT  
HARTFIELD, in his individual capacity;  
OFFICER JONATHAN GARCIA, in his  
individual capacity; OFFICER TAYLOR  
ROLLINS, in his individual capacity;  
and OFFICER RICKY RODRIGUEZ, in  
his individual capacity,

*Defendants.*

**UNOPPOSED MOTION FOR EXTENSION AND LEAVE  
TO FILE EXCESS PAGES**

Plaintiff Justin Pulliam respectfully asks the Court to extend the motions deadline by one week and grant leave to exceed the page limit for motions and responses by five (5) pages. Counsel for Defendants does not oppose this motion.

The parties completed discovery on August 31, 2023 and received the final deposition transcript earlier this week. To provide briefing to best aid the court in evaluating any forthcoming motions, Plaintiff requests that the motions cut-off deadline be extended one week to October 6, 2023.

The parties also seek to file opening and response briefs that are approximately 25 pages. Such length is warranted given that this case asks the Court to apply complex First Amendment law to two different sets of facts.

For these reasons, Plaintiff respectfully requests that this Court grant a one-week extension for the motions deadline and grant leave to exceed the page limit by five (5) pages for briefs in support of motions and responses to such motions.

Dated: September 22, 2023

Respectfully submitted,

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

Texas Bar No. 24099898

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Jeffrey Rows\*, of counsel

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### **CERTIFICATE OF CONFERENCE**

As required by Local Rule 7.1(D)(1), I certify to the Court that Plaintiff's counsel conferred with opposing counsel about the merits of this motion on September 21, 2023, and opposing counsel has indicated that he agrees with this motion.

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

*Attorney for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2023, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system and served by the CM/ECF system to all counsel of record.

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

*Attorney for Plaintiff*